

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBIN FORSLUND, TIMOTHY KELLY, MATTHEW MENTING, DONALYN NORTH, ROBIN RECTOR, ERIC OTTENHEIMER, GAIL ROSSI and GREGORY WILLIAMS, on behalf of themselves and all others similarly situated, Plaintiffs, v. R. R. DONNELLEY & SONS COMPANY, Defendant.	Case No. 1:22-cv-04260 SUPPLEMENTAL DECLARATION OF SCOTT M. FENWICK OF KROLL SETTLEMENT ADMINISTRATION LLC IN CONNECTION WITH FINAL APPROVAL OF SETTLEMENT Judge John J. Tharp, Jr.
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I, Scott M. Fenwick, declare as follows:

INTRODUCTION

1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Settlement Administrator appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision.

2. This declaration supplements the *Declaration of Scott M. Fenwick of Kroll Settlement Administration LLC in Connection with Final Approval of Settlement*, filed on March 1, 2024 (the “Initial Declaration”), in order to provide updated information to the Court regarding

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in that certain Amended Settlement Agreement, filed on October 25, 2023 in this Litigation.

the number of Claim Forms and Opt-Outs received by Kroll. The Initial Declaration is incorporated herein by reference in its entirety.

CLAIM ACTIVITY

3. The Claims Deadline was February 28, 2024.
4. As of March 21, 2024, Kroll has received 173 timely Claim Forms through the mail, five (5) late Claim Forms through the mail, and 3,692 timely Claim Forms filed electronically through the Settlement Website. Kroll is still in the process of reviewing and validating Claim Forms.

EXCLUSIONS AND OBJECTIONS

5. The Opt-Out/Objection Date was February 28, 2024.
6. Kroll has received thirty-five (35) timely Opt-Outs from the settlement. A list of the Opt-Outs received is attached hereto as **Exhibit A**. Class Members were not instructed to submit their objection to the Settlement Administrator, and none have been received by Kroll.

CERTIFICATION

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge and that this declaration was executed on March 21, 2024, in Inver Grove Heights, Minnesota.

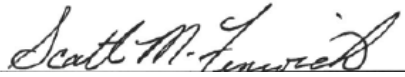

SCOTT M. FENWICK

Exhibit A

Exclusion List

Count	Record Identification Number
1	722916N1RY7B5
2	722916N1TCRG2
3	7229177D16XD2
4	722917BC2X3VZ
5	72291684WR6KZ
6	7229174W9PX9Y
7	722915W6022B7
8	722917TK6DD8C
9	722916011CZPF
10	722917ZRH6B7X
11	7229182KMNZXM
12	7229170HQCZ9D
13	722915THC1YPR
14	7229183C4568G
15	7229164H50CG7
16	722917NXT57YX
17	722916NFP3N4H
18	722917CKC5ZWT
19	722917GFWJ1SP
20	7229176D2S7Z0
21	72291684SXJ3T
22	7229164Z6SY9G
23	722915RJHXJ03
24	72291661WYCH7
25	722915T4HPXR9
26	722917H6109YJ
27	722915HTYTN3R
28	722916K6P52QM
29	722917H52SRTJ
30	722916TJSBDY3
31	7229164HXNRVC
32	722917B70WSNK
33	7229169SDZ14Y
34	722916MV9S1RR
35	722916SNN9YHV